

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
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Attorney for the Debtor

In Re:

Marie Claire Coulanges
AKA Marie Claire Beaudin
AKA Marie Claire Beaudin-Coulanges

Debtor

Case No.: 19-16501 (JKS)

Chapter: 13

DEBTOR'S OBJECTION TO MOTION TO DISMISS

Marie-Claire Coulanges (the "Debtor") respectfully responds to the Motion to Dismiss ("Motion") filed by the standing chapter 13 trustee (the "Trustee"). The Trustee brought the Motion on the grounds that the Debtor's plan as confirmed would be insufficient to pay claims in the amounts filed. Notably, the senior secured lender with a lien on the Debtor's home (the "Mortgage Servicer") filed a claim that is approximately \$29,000 greater than the Debtor had believed that she owed it.

The Debtor, however, has discovered a possible source of discrepancy. A portion of the Mortgage Servicer's claim represents municipal taxes that the Mortgage Servicer paid to the Township of Irvington. The Debtor, however, appears to have paid the same real estate taxes to the municipality. The Debtor is currently attempting to obtain documentation from the Township of Irvington that would show to which taxes her

payments were applied and whether the Mortgage Servicer's payments were applied to the same taxes.

Therefore, the Debtor requests that the Court deny the Motion at least until the Debtor can determine whether the discrepancy described above is the result of a clerical error.

Dated this the 17th day of October, 2019.

/s/ Andy Winchell
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